Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at http://about.jstor.org/participate-jstor/individuals/early-journal-content.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

RECENT IMPORTANT DECISIONS

ANIMALS—INJURIES BY ANIMALS AT LARGE.—In an action for damages for injuries sustained by the kick of a horse, the petition alleged that for many days the defendant carelessly and negligently permitted a horse owned by him to run loose on the streets unattended, and that the plaintiff while playing about was kicked by the horse. On demurrer, *held,* no cause of action stated because no allegation that the owner knew the horse was vicious. *Brady* v. *Straub,* (Ky. Ct. of App. 1917), 197 S. W. 938.

Injuries by domestic animals may be divided into two classes, usual and unusual, or those according to the nature of the animal and those not according to the nature of the animal. For instance it is the usual nature of a domesticated animal to stray if unconfined and the defendant is charged with notice of such propensity. *Tonawanda R. R. Co.* v. *Munger,* 5 Denio (N. Y.) 255. In the case of a trespass no negligence on the part of the owner need be proved. *Milligan* v. *Wehinger,* 68 Pa. 235; *Noyes* v. *Colby,* 30 N. H. 143. But if the animal is lawfully where it is, as on a highway, and is not trespassing, the owner is not liable without proof of negligence on his part for any injury it may do upon the highway. *Tillett* v. *Ward,* L. R. 10 Q. B. D. 17; *Griggs* v. *Fleckenstein,* 14 Minn. 81. Where, however the harm is not according to the nature of the animal the law holds that the owner or keeper is not liable unless it appears that he should reasonably have foreseen the likelihood of such damage through his knowledge of a vicious or mischievous propensity in the animal. *Crowley* v. *Groonell,* 73 Vt. 45; *Cox* v. *Burbridge,* 106 E. C. L. 430; *Eddy* v. *Union R. R. Co.,* 25 R. I. 451. But in *Dickson* v. *McCoy,* 39 N. Y. 400, where the facts were practically the same as in the principal case it was held that it was sufficient to allege merely that the horse was negligently turned into the street without restraint or control, as it is in one sense a mischievous habit for a horse to run and play in the streets. In *Fallon* v. *O'Brien,* 12 R. I. 518, the court said, in accordance with the New York cases, that a horse even though he is not vicious is a dangerous animal to be at large in the frequented streets of a city. These latter cases would seem to indicate that even where the injuries are not according to the nature of the animal it is not necessary to allege knowledge of the vicious propensity of the beast, and that the owner may be negligent regardless of such knowledge. See ROBSON, TRESPASSES AND INJURIES BY ANIMALS.

BLASPHEMY.—DEVISE TO COMPANY ORGANIZED FOR PURPOSE OF FURTHERING ATHEISM.—Property was devised subject to certain annuities "upon trust for the Secular Society Limited". The object of the Society was "to promote, in such ways as may from time to time be determined, the principle that human conduct should be based upon natural knewledge, and not upon supernatural belief, and that human welfare in this world is the proper end of all thought and action". On an originating summons asking for payment